

Exhibit N

Estate of Robert J. Reilly

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al,

Plaintiffs,

**AFFIDAVIT OF
PATRICIA REILLY**

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)

: SS.:

COUNTY OF BROWARD)

PATRICIA REILLY, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 2379 Caravelle Circle, Kissimmee Florida 34746.

2. I am currently 75 years old, having been born on March 7, 1947.

3. I am the wife of Robert J. Reilly, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from lung cancer on May 18, 2011. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On January 3, 2017, I was issued Letters Testamentary on behalf of my husband's estate by the State of New Jersey, Monmouth County, Surrogate's Court.

6. Robert was a great man and husband. He came into my life after my first husband had passed away due to an illness. It was like a storybook romance. He helped me continue raising my youngest son, and he developed a great relationship with my other children and, later, all of the grandchildren. We enjoyed going to dances, visiting my children, and caring for our grandchildren on weekends. We also enjoyed traveling and often went on cruises and weekend trips to Atlantic City.

7. My husband worked in maintenance at a building not far from the World Trade Center. He was responsible for general maintenance around the building and keeping the building clean, especially water tanks, air conditioners, and other mechanical items. He spent two weeks working at this building immediately after 9/11. Several firefighters working at Ground Zero rested at this building since it was so close.

8. The building Robert was working in was covered in a 1 to 2-inch layer of toxic dust that resulted from the collapsed World Trade Center buildings. He needed to call in an outside cleaning company to help remove the dust. He was there working for about a year after the attacks before he started getting ill.

9. Robert began going to a World Trade Center Health Program once he began feeling sick. He was having health problems and trouble breathing. He was chosen for a case study they were conducting. It was Health Program doctors who found nodules on his left lung. He eventually needed one-third of his lung removed due to these nodules. The surgeon could not remove a third nodule during surgery, and it was this nodule that would later metastasize the cancer to his liver.

10. In addition to his health problems, Robert also suffered severe emotional issues due to the attacks. Of the busload of people he traveled to work with, he was the only one who

survived the attacks. Until the day he passed away, he couldn't understand why he was the one from that group to survive. He felt terrible guilt over it. Robert also suffered from PTSD and was treated by a therapist for a long time. Due to everything he was going through, my husband had a difficult time performing his duties at work.

11. Following a CT scan at the end of 2010, Robert's cardiologist noticed a mass on his liver and instructed him to see an oncologist as soon as possible. Robert would eventually be diagnosed with Stage IV cancer and given only about six months to live.

12. The cancer diagnosis negatively affected Robert's emotional state. His whole personality changed. He became defeated, depressed, and isolated. He had been a happy-go-lucky guy, but he became somber and withdrawn. He feared every day was going to be his last.

13. Because of his lung surgery and cancer, Robert was in constant pain and was prescribed Percocet, which provided temporary relief. He also went for chemotherapy treatments. As a side effect of these chemotherapy treatments, he was constantly fatigued, lost his hair, often threw up, and experienced depression. His body eventually became emaciated and dwindled down to nothing. He started having mobility problems and required a wheelchair. My oldest son would help him walk and move around, especially when going to one of Robert's appointments.

14. My husband had been very active before his illness. He would work in the yard, go on long walks, and play with our grandchildren. Once he began having health problems, he could not be active and continue doing the things he enjoyed. He especially liked attending church, but even that became a struggle.

15. It is difficult for me to think and talk about the pain I saw Robert suffer. He was only given six months to live, and he indeed passed away within those six months. He fought the

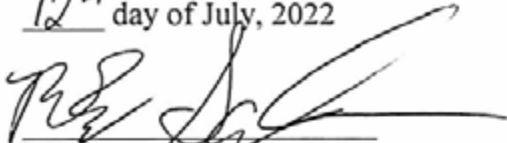
good fight, but his health rapidly deteriorated. He became weaker by the day and ultimately became barely recognizable.

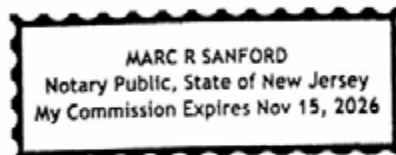
16. Robert's passing robbed him of years with me and the rest of our family, especially our grandchildren. All six of the grandchildren adored Robert since he was the only grandfather they had the chance to know. They would visit every Friday night and not leave until Sunday night, staying the weekend with Robert and me. We would do many things together like baking cookies and visiting various places. Both Robert and the grandchildren have lost out on the opportunity to spend time together and create precious memories.

17. Robert's illness turned his and everyone's life upside down. He suffered from a multitude of health and other issues after the September 11, 2001, terrorist attacks.


PATRICIA REILLY

Sworn to before me this
12th day of July, 2022


Notary Public



Estate of Antolino Rexach

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X
SUZZANNE ANDERSON, et al,

**AFFIDAVIT OF
PRECILLA REXACH**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF OKLAHOMA)
 : SS.:
COUNTY OF ROGERS)

PRECILLA REXACH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18525 Bushyhead Road, Chelsea, Oklahoma 74016.
2. I am currently 51 years old, having been born on February 19, 1971.
3. I am the wife of Antolino Rexach, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from metastatic stomach cancer on September 27, 2014, at the age of 50. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On November 2, 2015, I was appointed personal representative of my husband's estate by the District Court Within and For Rogers County, State of Oklahoma.

6. I had a great relationship with my husband, who was a loving and devoted family man. We loved to spend time together and do things as a family. We loved taking trips together and going fishing near Claymore Lake. We valued family time more than anything, and my husband would fly out to Oklahoma on weekends to spend time with us when he had to stay behind in New York and work to provide for us. When he retired in October 2008 and rejoined us in Oklahoma, we had so much fun together and tried to spend as much time with each other as we could to make up for lost time.

7. On 9/11, my husband was working as a corrections officer at the Manhattan Court near the World Trade Center. We didn't hear from him for three days, which was one of the most agonizing periods of my life. We didn't know if he was dead or alive. When we did see my husband, he was covered in dust and debris and in shock since he was caught in the chaos near the World Trade Center. He stayed behind to help people and felt like it was his duty to do what he could.

8. Within a few months of 9/11, my husband got sick. He had trouble eating. He went to the bathroom so many times a day. He threw up. He lost a lot of weight. He told me it felt like his stomach was burning from the inside. He would scream in pain and say it was like being tortured. He threw up uncontrollably and lost so much weight that at one point they had to give him a feeding tube. He complained of chest pain. He went to the doctor on and off for over a decade – between 2002 and 2014 – trying to get answers on why he was ill and losing weight. He was finally diagnosed with stage IV stomach cancer in April 2014, at which point it had spread too far. He received aggressive chemotherapy and radiation from the Cancer Treatment Center in Tulsa, Oklahoma. He would shake uncontrollably from the chemotherapy. He was in so much pain and would cry and scream that it felt like his stomach was burning up. He declined

rapidly after his diagnosis and died a few months later in September 2014. It was heartbreaking that, by the time he finally got answers, it was too late to save him.

9. My husband went from a strong and proud man to someone who was vulnerable and needed help. He often cried because the pain was unbearable and felt like stabbing in his stomach. He told me he felt like he was being tortured and didn't understand why this was happening to him. He went to doctors to try to find answers, and they didn't know for a long time. He tried to power through the pain but knew something wasn't right. He was nervous and afraid that he was going to die. My husband had a mental decline from his illness too. He would forget basic things. He couldn't remember me at times. He was not the man he was before 9/11.

10. My husband knew the financial toll his illness put on our family. He knew that I had to work around the clock to help support us and make sure that we had insurance so he could receive all his treatments and medications, which made him feel so badly. He worried about me and how I would manage once he was gone.

11. My husband was incredibly selfless and wanted nothing more than to give back and help after 9/11. It hurts me to know that he suffered so horribly for so long as a result of his exposure. It is hard to know that he is gone and will never be able to celebrate milestones with our family or meet all his grandchildren.


PRECILLA REXACH

Sworn to before me this
13th day of July, 2022


Notary Public



Estate of Richard Edmund Rodenheiser

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

**AFFIDAVIT OF
COLLEEN MARIE
RODENHEISER**

SUZANNE ANDERSON, et al.,

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF VIRGINIA)
 : SS.:
COUNTY OF NORFOLK)

COLLEEN MARIE RODENHEISER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1889 Brookwood Road, Norfolk, Virginia 23518.
2. I am currently 50 years old, having been born on December 31, 1971.
3. I am the wife of Richard Edmund Rodenheiser, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. On December 5, 2017, my husband passed away from colon cancer, at age 50. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On May 23, 2018, the Norfolk Circuit Court for the Commonwealth of Virginia certified me as the Administrator of my husband's estate.
6. Richard and I had a wonderful relationship, and he was a great father to all of our girls. I met Richard after my cousin came over to visit my house one day in 1988. While my

cousin and I were watching TV, my cousin had a seizure. We called the volunteer fire department and Richard showed up along with the paramedics. It went on from there, and we officially started dating on March 14, 1990. We were always together and talked constantly. All of those early years were incredibly fun. We would go out to movies, and he got me into gaming on the prodigy network, where we played Dungeons & Dragons titles like Out of the Abyss. We got our first place together in 1992 and eventually had three beautiful daughters together. When my daughter, Gabrielle, was just 16, she gave us our first grandson, Hayden. Hayden became Richard's love, and he always referred to him as his "little minion." Now, Hayden misses his grandfather so much, and we talk about him all the time. Since Hayden's brother, Ren, and his sister, Ellie, were born, I try to tell them as much as possible about Richard so that they can know a little bit about who their grandfather was and what he was like.

7. Over the years, we did many things as a happy family. Together, we took our daughters, as well as our grandchildren, to the zoo and many other fun activities. Regularly, we would go out to the movies and for dinner. Even though he was working two to three jobs at once, Richard would always make time for us. I always enjoyed spending time with Richard and have many fond memories of going to the park together, as well as time with the whole family attending Harbor Fest in downtown Norfolk, a great event where all the old sailing ships are in the harbor. Fourth of July celebrations were always a particularly good time to spend together, with my mom visiting sometimes so we could all enjoy. After moving to Virginia, Richard and I tried to bring the girls back up to New York when we could so that they could visit with family and old friends. Richard passed away when he was only 50; he was the love of my life and absolutely adored by our daughters. My life hasn't been the same within the last five years since he passed away, and I'm sad that he's missed out on so much since that time.

8. I remember September 11, 2001, like it was just yesterday. First, I dropped off our daughter, Samantha, at her school. At the time, our other daughters, Gabrielle and Ashley, roughly three and four years old at the time, were still at home. I received a call from Richard, who worked for Con Edison at the time, from the yard at East 16th Street. Richard advised me to watch the news and, after turning on the TV, I saw the first tower was engulfed in flames. I called my mother-in-law into the room, who was living with us in Centereach, NY. I told my sister that Richard explained that he was probably going to be quite a while getting out of the City because they canceled all work that day and he had already been assigned to work in the

World Trade Center area, which was now Ground Zero. Richard was assigned to work on transformer vaults and a manhole, which included the high voltage and low voltage cables. Richard saw things were becoming increasingly chaotic and said he wouldn't be home for a while and that he may have to sleep on the floor in the yard. I told him I loved him and that he better come home. When I got off the phone with Richard, that's when I saw the second tower struck by United Flight 175. I called Samantha's school and was informed that they were on lockdown but that the children are safe. I kept wondering how she is going to understand what's going on. She was only six years old. My other daughters were only three and four years old. Especially for those two, the only thing they would be able to understand was that mommy was crying and upset. Richard didn't return until after seven o'clock that evening, except he was covered in soot and dust. You could see cars and trucks were covered too. Richard wasn't alone either; I saw neighbors coming home with all that crap on them. It was so bad I told Richard to change before coming in the house and to throw away his clothes, even if it meant getting a new uniform from Con Edison.

9. When Richard went into work the next day, all of his assignments were shifted around. That day, Richard was literally right by the pile working out in the manholes because most of the electric power in lower Manhattan was out due to the collapse of 7 World Trade Center. Most people don't realize that Con Edison operated a substation in the sub-basement of that building, resulting in a massive loss of service. As a result, scores of utility crews, including my husband's, were all down there and remained there for over a year. While the utility said the crews would be relocated to midtown, the City of New York insisted they continue work around the World Trade Center. Apparently, the city had asphalted over many of the manholes in the process of making the area accessible to dump trucks. As a result, Con Edison had to dig them out and my husband assisted in this process, requiring him to continue work in the area over the course of an additional year. The continuing work involved dozens of manholes and transformer vaults, which needed repair and rewiring. In one instance Richard came home crying, explaining he had thrown up after he and his partner came across a manhole with a body that had been trapped inside. The body they had seen was only from the torso down. Ultimately, his work in that area continued through October 2003. While this was going on, Richard's mother had broken her hip after a nasty fall. She never recovered and passed away in 2003, complicating things further for Richard and his mental health.

10. Around August 9, 2016, Richard received a concerning call from his doctor. The doctor said that Richard's routine bloodwork was very strange because his hemoglobin levels were at a 3, whereas they normally would be over a 15. As a result, the doctor suspected there may be internal bleeding somewhere in his abdomen. We went to the hospital, and they did two blood transfusions. In addition, Richard had an endoscopy, which was clear. However, the next day, August 11, 2016, Richard had a colonoscopy, which led the doctor to find a tumor in his abdomen around 11 x 14 centimeters, which they marked with a tag. The diagnosis was devastating. More frustrating, at the time, a doctor told me that the tumor was on Richard's right side, behind his liver, which turned out to be incorrect. During this process, we encountered a nasty oncology surgeon who kept saying the tumor was on the right side, even though when I reviewed the imaging from the CAT scan, the mass appeared to be on the left side. Clearly, the oncologist confused the left side with the right and upon reviewing the CAT scan again, he said, "it's on the left." Refusing to deal with such a quack, I called the Cancer Treatment Centers of America and made an appointment. We flew up there in the same August and stayed for about three days. The first day was a tour of the hospital to show that their facility offered everything under one roof. Over the next two days, Richard underwent extensive testing because they wanted to confirm everything for themselves, also concluding that the tumor was on the left. I was pleased that they corrected the prior doctor's mistakes. Once Richard became a patient at the Cancer Treatment Centers of America he was quickly scheduled for surgery in early September. Waiting for Richard to emerge from the surgery was an agonizing experience. What was meant to be a three-hour procedure turned into more than seven hours because the doctor found additional tissue with tumors and needed more time to remove them. They had to take out a lot of his colon and reattach it. After the surgery, Richard was required to stay in the hospital for about one and a half weeks. Essentially, Richard was discharged after he was able to pass stool, which took time because everything was numb, and his nerves had to reconnect.

11. In November 2016, we flew back up to the Cancer Treatment Centers of America so that they could install a port in Richard for chemotherapy. As soon as he received the port, Richard began chemotherapy the same day. From there, Richard would have to undergo one four-hour chemo treatment every two weeks. This continued through late May of 2017. In addition to the chemo, Richard was prescribed additional pills, which he needed daily, as well as pain medication. Then, in May 2017, Richard underwent further MRI and PET scans, which

appeared to show he was in remission. He continued the chemo pills just in case. However, around mid-October 2017, Richard began losing a drastic amount of weight. As a result, we returned to the hospital, at which point additional scans showed that the cancer had returned. Only this time, the cancer had spread to his pancreas, liver, lungs, and his colon. The doctors suggested that we try a dose of immunotherapy and see how that goes. Unfortunately, the immunotherapy was not effective, and they estimated he would only have another five or six weeks. Since he passed away on December 5, 2017, their estimate was more or less correct.

12. During the time he was battling cancer, I could see that Richard was always in substantial pain. Even though he had all these painkillers, nothing seemed effective at dulling his physical pain. When I saw Richard get angry, I could sense this was out of frustration from the physical pain. He complained to me that his bones hurt all the time and explained that his extremities were always sore. I saw how Richard's pain in his arms was the worst for him because it became harder and harder for him to lift up his grandson and give Hayden a hug like he used to. With Richard in so much pain, I saw a different side of him that wasn't him. I saw a man who was broken and defeated and, even though was with family, he looked as though he were all alone.

13. The cancer diagnosis itself, even back in August 2016, was so devastating to Richard's emotional well being that it became difficult for him to maintain a sense of hope. Even though our family made it clear to him that we were there for him and would help him fight the disease, I think he was so hurt that he all but gave up that day.

14. Almost right away, I could see Richard's attitude and personality began to change after he was diagnosed with cancer. He was depressed, especially toward the end of his life, and started to say nasty things, which I'm sure he didn't mean. Essentially, it was just the cancer talking, and he would take out his anger and frustration on others. I know he was a kind sweet-hearted man; although Richard's declining health bothered him so much, he lashed out because he knew that he wasn't going to be there for his daughters, his grandchildren, and wouldn't be able to see his family grow. Unfortunately, this state of mind resulted in anger, especially after October 2017 when the scans showed that the cancer came back with a vengeance and had spread further than we previously thought.

15. I wish I could say that Richard tried to instill confidence that he would fight it or that things would be alright. However, in addition to his frustration, my husband was scared by

what was happening to him and had a lot of fear. We kept telling Richard, things would be ok; although he would say, "no it won't because I won't be here to support you guys" and that "I won't even be able to hold Hayden or hug my girls anymore." When I tried to talk to him, those would be the kind of responses I would get; although, if he was feeling even worse, Richard might have used some coarse language. Sadly, Richard's mind started to gradually become detached from reality. Despite the extensive treatments that were attempted, their effectiveness was limited against the severity of the cancer while the side effects were uncomfortable and real.

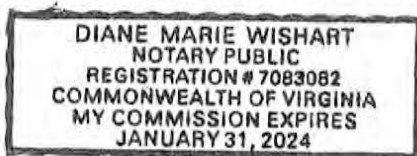
16. What happened to Richard and how it affected him in the last year of his life was extremely depressing. Richard died way too young, and I wish we had many more years together. I will always love him and have decided I will never ever remarry because I had already found my epic love and soulmate. I look at it this way; Richard was murdered on 9/11, it just took 16 years for him succumb to the injuries inflicted at that time. And that's how I see it.

Colleen M Rodenheiser
COLLEEN MARIE RODENHEISER

Sworn to before me this
12 day of July, 2022

Diane Marie Wishart 7/12/22
Notary Public

July 12th 2022



Estate of Robert Rolon

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
JASON ROLON**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

JASON ROLON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 732 Correll Avenue, Staten Island, New York 10309.

2. I am currently 47 years old, having been born on January 29, 1975.

3. I am the son of Robert Rolon, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. On August 4, 2015, my father died from Acute Lymphoblastic Leukemia. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On November 13, 2015, I was issued Letters of Administration on behalf of my father's estate by the Circuit Court for Pasco County, Florida Probate Division.

6. In 2004, my dad retired from his job as a doorman on Park Avenue and moved to Florida. This created some distance between us, but we still had a great relationship and would

talk on the phone on a regular basis. When I would visit my dad in Florida, we often would go fishing, which was his passion. When I was younger, dad would arrange for us to go on camping and fishing trips and encouraged us to bike as much as possible. My dad was always there when we needed him. He was a gentle soul and also very quiet and humble. Probably, most of all, whenever I would visit him in Florida, we would often spend the whole day fishing on a boat or off a pier. What I miss the most about my dad is not having the opportunity to share what was going on in my life and him not knowing all that my sister and I have accomplished.

6. On the day of the attacks, my father was on vacation in Florida. When he came back to New York, he returned to his home on the 14th floor of 310 Greenwich Street, just blocks from ground zero. Since there was a smoldering fire pit burning nearby my father's home after the attack, he could smell the stench in the air all the time. While the Red Cross provided a small air purifier, it wasn't very effective at making the environment much safer. At the time, it was difficult to assess the severity of the toxicity of all the fire and smoke emanating from the World Trade Center rubble.

7. My father had no serious health issues through the years. However, on New Year's Eve of 2014 (going into 2015), he called me to tell me that he was in the hospital. A few days later we learned that he had leukemia. Since I lived in New York and dad was in Florida, it was difficult to have a complete understanding of the diagnosis. However, keeping in contact with his doctors, I learned more information as my dad's cancer progressed. After speaking with his doctors, I would call my sister to relay whatever new information I had just learned or just to keep her updated on my dad's health status. One of the toughest things I ever had to do was to encourage my dad to live and be as strong as possible when I knew that he really didn't have much longer to live. I tried to visit my dad in Florida as often as I could, but it was difficult because it wasn't just easy to jump on a plane and go. I often felt terrible guilt that I couldn't be there for him on a daily basis.

8. After my dad was diagnosed with cancer, he did receive a couple of chemotherapy treatments, mostly in the form of blood transfusions. The transfusions made my dad feel much better and placed him in better spirits. His doctor explained, however, that chronic blood transfusions was not a practical way to live. Sadly, no further treatment options were presented, and the doctor told us that my dad would need to go into hospice care. In July 2015, my father was barely capable of speaking. We had to accept that his cancer was worsening, and

he didn't have much longer to live. It was devastating to have to come to that realization. He was released from hospice on August 3rd and wasn't even home for 24 hours before passing away. He was staying at his girlfriend's house at that time because she was providing much of his care. On August 4th, he woke up briefly and then passed away.

9. My dad was kind of quiet. As far as describing how he felt, however, I could hear in his voice each time we spoke that he was upset and quite scared. It was tough knowing my dad was so scared because it was highly unusual for him to be distressed. After my dad was informed that there would be no more blood transfusions and that he would need to be placed in a hospice, his anxiety level increased, and he retreated into a depression.

10. Towards the end of his life, my dad experienced a lot of physical pain. He couldn't perform even simple tasks without pain or worrying about his health and safety. He had painful bowel movements, which became very bad. Later, he had trouble walking and developed serious mobility issues. One day, he attempted to ride his bicycle and wound up having a fall. After falling off the bicycle, dad knew the cancer was beating him. He then had to use a rollator and a walker to help him move around. Luckily, his girlfriend, Joan, was around most of the time and would help him go to the bathroom and make sure he didn't slip in the shower. As time progressed, my dad became weaker and lost a lot of weight. As he became frailer, he worried that he may fall and break a bone. Hospice provided him with morphine to manage the pain. Ultimately, my dad went to the hospital before he passed. By that time, he was not eating and could barely speak or breathe.


11. My dad's whole personality changed during his illness. He became frustrated and belligerent, especially with Joan. This was so out of character for him. He had always been a gentle man. Then, at times he would be extremely quiet. It was a rollercoaster of emotions for him. He also had very little appetite, and we encouraged him to try to eat healthy. He resented that he couldn't do things for himself and needed assistance with just about everything. It was

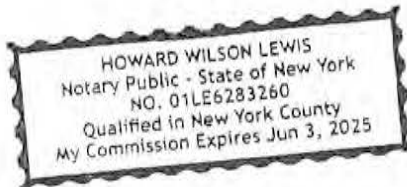
very emasculating for him. He knew he was dying and was trying to fight it as long as possible, but the illness was just too advanced.


JASON ROLON

Sworn to before me this

29 day of April, 2022


Notary Public



Estate of Boris Rozenberg

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
JACOB ROZENBERG**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)

: SS.:

COUNTY OF KINGS)

JACOB ROZENBERG, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2006 Avenue V, Apt. 8A, Brooklyn, New York 11229.

2. I am currently 36 years old, having been born on October 5, 1985.

3. I am the son of Boris Rozenberg, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. My father passed away from pulmonary fibrosis on September 26, 2007, at the age of 61. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On July 22, 2019, I was issued Letters of Administration on behalf of my father's estate by the Surrogate's Court of the State of New York, Kings County.

6. I was very close to my father, as I was an only child. We did lots of activities together. In my first year at NYU, I was studying electrical engineering. A big portion of that coursework was in computer science, so my father helped me with my schoolwork. We went on

vacation together and went fishing together. We rollerbladed together. My father gave me good guidance in life. He always encouraged me to put in 100% effort to any endeavor. He taught me to be a man of my word. He shaped my morals and taught me to be there for my friends and family. My dad always motivated everyone in our family. He encouraged my mother to take the NYC civil service exam, and she ended up getting a job with the Department of Health which she still has today.

7: My father was in charge of software for the NYPD. On September 11, 2001, my father was at work at 1 Police Plaza in lower Manhattan. He and my mother both worked near Ground Zero and were both present on the day of the attacks. When they were ordered to return to their respective offices, my mom said, "I don't care if they fire me, I won't go back until that smoke clears." She didn't go to work for two months. But my father had no choice. He had to return to the office. So, my dad returned two or three days after 9/11 to 1 Police Plaza. He breathed in all that dust day after day.

8. In 2002 or 2003, my father was diagnosed with pulmonary fibrosis. I was in eleventh or twelfth grade at the time. He took prednisone to suppress his immune system. In 2004, he had viral pneumonia and was admitted to the hospital because it started to get so bad. I remember that when my dad was in the hospital with pneumonia, my mother overheard the doctors saying they were waiting for my father to die so they could take his organs for donation. My mother called the NYPD, who came to the hospital and demanded that they treat my father's pneumonia. He barely made it out of the hospital.

9. He went back to work with a small oxygen tank in 2005 and 2006. One day, he was very, very sick at work. He called me and said the police had to drive him home to Bensonhurst where he lived. His immune system was very weak, even a flu could have killed him. He was on so many medications. I don't think they were all necessary. Toward the end of his life, my father was on the list for a lung transplant. He was number three or four on the lung transplant list before he died. He almost got it, but he didn't.

10. My dad had a very resilient character. He was from a tougher generation. My father wasn't an emotional person, and he didn't really complain about his illness. He was just hopeful for a lung transplant. But I saw how much he struggled. At one point, he couldn't even walk fifty feet without sitting down. He even went to work in that condition. He would walk to

the train station in Bensonhurst with the oxygen tank. And he didn't even want to use the oxygen tank. Twice a month, we would have to go in person to the hospital to see if he could get the transplant. My dad even won a lottery for a pulmonary fibrosis drug trial called pirfenidone, which now is saving people's lives. At the time, the doctors were trying to get authorization for secondary use. But he never got a chance to actually take that drug.

11. My dad always had a short fuse. Toward the end of his life, he didn't have as much of a short fuse. He wouldn't get pissed off like he used to because he knew he couldn't control his situation. He was calmer. In a way, it was very sad.

12. I wish my father was here to yell at me more. He had a great sense of humor, a critical sense of humor. I remember before 9/11, he and I were cleaning out my great aunt's apartment in the Bronx after she died. He told me, "You should just start cleaning all the stuff out of my apartment now, because I'll be gone soon." It was funny at the time but it's sad because I now realize how little time with him that I had left.

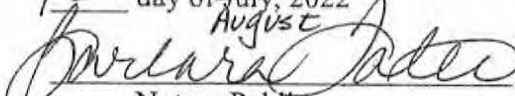
13. My dad was only 61 years old when he passed. He should have been able to enjoy many more years with his family. Had he not been exposed to the 9/11 toxins, he would still be with us today.

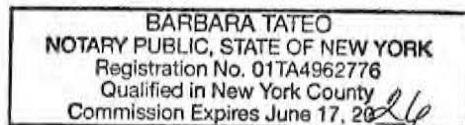

JACOB ROZENBERG

Sworn to before me this

~~4th~~ day of ~~July~~, 2022

August


Notary Public



Estate of Colin Michael Sargent

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al,

Plaintiffs,

**AFFIDAVIT OF
LINDA L. SARGENT**

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ERIE)

LINDA L. SARGENT, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 28 North Street, Hamburg, New York 14075.
2. I am currently 72 years old, having been born on September 9, 1949.
3. I am the wife of Colin Michael Sargent, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from metastatic esophageal cancer on June 25, 2014. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On November 19, 2015, I was issued Letters Testamentary for my husband's estate by the Erie County Surrogate's Court of the State of New York.

6. My husband and I were married 41 years and raised four beautiful children together. Until the time he got sick, we had a very happy and healthy relationship. Two of our daughters received full-college scholarships for tennis. When the kids were growing up, we were very focused on their athletic training and spent a lot of time on the road because of that. All three of our girls were excellent softball players, as well. My husband coached them in both sports.

7. My husband was a safety agent for OSHA on and in the aftermath of 9/11. He volunteered to go to ground zero the day after the attacks. OSHA was supposed to send Personal Protective Equipment for the first responders. He was supposed to spend a week giving out PPE. It took four days for the equipment to arrive. During that time, nobody had protective masks, including my husband. But he helped in any way he could, providing food, water and other supplies. He never told me any details about the time he spent down there.

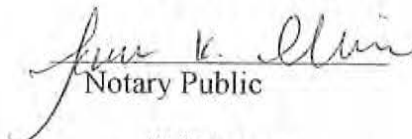
8. My husband was diagnosed with Stage IV esophageal cancer in November of 2013. He wasn't feeling well, and he went to the Emergency Room. He thought he had a bad case of the flu. After conducting extensive testing that day, we got the diagnosis. It happened that quick. He was treated with aggressive chemotherapy and radiation, but there wasn't much they could do. The treatments were very difficult for him to handle. He was always nauseous and dizzy. He was in a lot of pain, especially in his throat and stomach. He didn't sleep and couldn't eat. The chemotherapy caused horrible sores around his mouth. He was so uncomfortable. He was very down and out, although he tried to stay strong mentally. He was very weak, physically. He was confined to a chair with a lift and moved down to the first floor of our home, which was difficult because there's no bathroom downstairs. It was probably in January 2014, when he could no longer make it up the stairs by himself, and he needed to use a portable toilet. It got to the point where he really couldn't do anything. Eventually, we put in a hospital bed for him.

9. My husband didn't want friends to see him in the condition he was in. It was just our immediate family. He was suffering from depression. From November until June, we were very much confined and didn't leave the house for anything other than medical appointments. He could barely eat until they put a port and feeding tube in his arm. We didn't have any medical aides helping us. My husband would only allow me to take care of him. He was adamant about that.

10. My husband was always very healthy and health conscious. He didn't smoke or drink. He exercised every day. Unlike a lot of men, he kept on top of his doctor's appointments and got routine tests when they were due. He was only 62 or 63 years old when he was diagnosed. It felt like the diagnosis came out of nowhere and to have it be so advanced was devastating.


LINDA L. SARGENT

Sworn to before me this
9TH day of July, 2022


Notary Public

JAMIE K MORRIS
Notary Public, State of New York
01MO6406151
Qualified in Erie County
My Commission Expires 08/23, 2024

Estate of Michael Patrick Shea

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al,

Plaintiffs,

AFFIDAVIT OF
INGRID M. MORALES

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

INGRID M. MORALES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 12 Harbour Lane, Unit 1A, Oyster Bay, New York 11771.
2. I am currently 59 years old, having been born on January 25, 1963.
3. I am the wife of Michael Patrick Shea, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from brain cancer on April 1, 2017, at the age of 52. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On August 16, 2017, I was appointed Administrator of my husband's estate by the Surrogate's Court of the State of New York, Nassau County.

6. My husband and I were teammates and partners in crime. We did pretty much everything together. Michael was an outgoing, talkative person, with a sharp sense of humor. He loved goofing around with his friends, and they all sort of teased one another. He'd always talk about New York sports teams. My husband liked being around people. He liked taking care of me and our home. When we needed stuff done around the house, I was the supervisor, and he was the worker. Michael was very good at fixing stuff and renovating it. I was very good at telling him what needed to be fixed.

7. Michael was working as a Nassau County Police Officer on September 11, 2001. It was actually his day off, after working a 36-hour shift. We were out grocery shopping when a friend called to tell us what was happening in downtown Manhattan. We rushed home to watch it on television. He called his command and found out they were sending him and other officers down to Ground Zero. The shift started at 6:00 p.m. and continued until the following evening at 5:00 p.m. When Michael came home after that first day, his uniform was filthy, covered in debris. He told me not to touch it. He didn't know what was on it, if it was safe. And he went back wearing the same uniform. Even if he had another uniform, he couldn't let anyone touch this one to clean it. He came home, slept and went out there again for the next three days. He was directing traffic and helping to block off the streets.

8. Michael didn't have any symptoms for 15 years. By the spring of 2015, he started having bad headaches. He didn't think anything was strange because he had allergies, and it was allergy season. I'll never forget the date- August 10, 2015, a Monday. Michael wasn't feeling well and went to the doctor. The headache was driving him crazy. The doctor said it was allergies. He knew this wasn't a typical headache or allergy. The next day, he went to the local hospital to get another opinion. He phoned me to say they were transporting him to a hospital

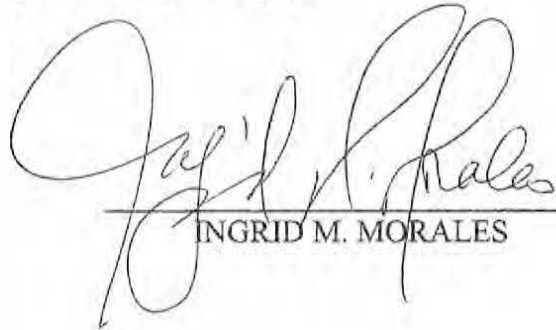
with more sophisticated equipment, because he needed MRIs and brain scans and then that they needed to do immediate surgery on his brain. The diagnosis was brain cancer. After the surgery, he was treated with radiation and chemotherapy. The beginning of radiation treatment wasn't that bad. He was nauseous and had constipation that went away with medication. When he was back home, he turned into a completely different person, a shell of a person.

9. As a result of surgery and the treatments, Michael didn't have the capacity to communicate or remember things. He'd call my name and just expected me to know what he wanted. You could see how sad and frustrated he was, trapped in his own mind and body. His balance had gotten so bad that I had to follow him everywhere. I arranged for a hospital bed be delivered to our house because he couldn't get up and down the stairs. He's a big person in this small area, especially when the lights were off, and he would get so confused. When he needed to go to the bathroom, I would help him, but sometimes he would urinate on the bed because he thought he was in the bathroom. He became helpless, and he didn't let anyone else but me touch him. He'd forget where he was. He'd get angry and say that he wanted to go home. I tried to explain to him that he was already home. Michael didn't want to socialize with friends. He didn't want them to see him this way. He was embarrassed. Because of the medications he was taking, Michael gained a large amount of weight. He would cry at night when he thought I couldn't hear. He was so unhappy and depressed.

10. He was angry, too. He used to ask, "Why me?" He was diagnosed at 51-years old and died at 52. He wasn't protected that day. He did his job to protect other people, but no one protected him. Michael and I had plans. In April 2015, he was promoted to lieutenant. His goal was to work for a couple more years and be able to retire at a higher salary. My husband loved

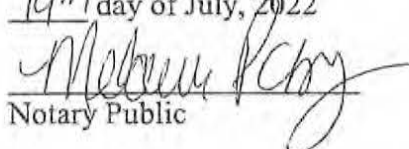
visiting Ireland. He wanted to go back and stay for a month, just to explore. That was the plan. Unfortunately, he never got to do that or many other things he enjoyed.

MELANIE PAEZ
Notary Public, State of New York
No. 01PA6263748
Qualified in Nassau County
Commission Expires June 11, 2024



INGRID M. MORALES

Sworn to before me this
19th day of July, 2022



Notary Public

Estate of Howard Bernard Sherman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

_____X
SUZZANNE ANDERSON, et al.,

Plaintiffs,

**AFFIDAVIT OF
KAREN SHERMAN**

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
_____X

STATE OF NEW YORK)
 : SS.:
COUNTY OF WESTCHESTER)

KAREN SHERMAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 199 Brewster Road, Scarsdale, New York 10583.

2. I am currently 79 years old, having been born on December 12, 1942.

3. I am the wife of Howard Bernard Sherman, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. On February 20, 2015, my husband died from metastatic lung cancer. It was determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On August 14, 2015, I was issued Letters Testamentary in my husband's estate by the Surrogate's Court of the State of New York, Westchester County.

6. Howard and I were extremely close. We met through a friend that he knew from his law school who introduced us. And within about eight months, we got married. Howard was very involved in my life and was always a wonderful husband. Over the course of our marriage, we enjoyed traveling into the city to go to the theatre, the opera, and visiting art galleries. In addition to traveling, visiting museums, and enjoying life, we raised three girls together. Howard was a great dad, very devoted to our daughters. As a father, he did anything that needed to be done. He was the perfect guy. While art was one of our many shared interests, it was always my passion. I was an art major, and we would see museum exhibitions together all the time. Remarkably, Howard took this interest to another level and went back to school to study for his master's degree in Art History. While he worked as an attorney, practicing in personal injury/medical malpractice, he would attend classes at Hunter in the evening so that we could have equal masters' degrees.

7. On September 11, 2001, my husband and I were returning from a trip to Italy. Over the intercom on the plane, the pilot said that we are forced to make an emergency landing in Canada. I told Howard that something didn't feel right because the plane made an unusually fast descent. Upon landing, the pilot explained that the FAA ordered the flight to land in Newfoundland because the United States had been attacked by terrorists. Certainly, this was a frightening experience, as our children didn't know where we were, and it was impossible to get calls through. During our unplanned visit to Canada, we ended up sleeping on the floor of a Pentecostal church for almost a week. Finally, when the airline announced that our flight returning to New York would be connecting through their hub in Atlanta, I spoke with the pilot and explained that they can't do that because my husband and I needed to return home to observe the high holidays. In a remarkable showing of compassion, the flight plan was adjusted to go straight to New York. When we returned home, it was a relief to see our daughters, who cooked us dinner so we could celebrate as a family. After the holidays, my husband resumed work in his law practice, which was located in the Woolworth Building at 233 Broadway, just a few blocks from where the Twin Towers once stood. Howard continued to work in the same location for several more years. Over the years, we learned of other individuals who worked in the same building who developed the same cancer, including Howard's partner and my friend's husband, who both died of lung cancer.

8. For most of Howard's career he was very strong and healthy and would exercise regularly. He was in good shape and enjoyed an active lifestyle, which included running and playing golf. Howard even ran three or four marathons. Howard would commute to work on the train and never had any problems. All of this changed after 9/11. Within a few short years after 9/11, Howard complained that his back hurt. Aside from that, he didn't have much other symptoms. My son-in-law, a doctor, recommended he see a physiotherapist. When Howard's back pain didn't improve, we took him to have a CAT scan. Upon seeing something concerning, around December 2013, the doctors ordered a PET scan, which revealed the cancer. This was quite surprising to us at the time because I had just taken Howard in for a checkup, which even included an X-Ray, and were told everything was clear. It seemed so quick after the diagnosis that Howard's cancer had spread all over the place, including to his brain. By the time my husband's cancer was detected, it was too forgone, and surgery was impossible. We began to treat my husband's cancer at Sloan Kettering, where he received chemotherapy and radiation for the cancer detected in his brain. Soon afterward, we became aware of a new immunotherapy treatment for lung cancer. Sloan Kettering explained that the drug was so new that they didn't have it. Although we obtained some doses of the drug, Howard was able to only receive two doses, and it didn't work. From there, I had Howard stay at home with me as his condition worsened and provided hospice care in the home. At that point, he never left our bedroom. It was only about 14 months from the time Howard was diagnosed until he passed away.

9. During the time he was battling cancer, I could see that Howard was in a lot of pain. Toward the end, I put a hospital bed in my bedroom for him, and as his condition became worse, he was on morphine, with increasing doses as his pain became more intense. The time we had left seemed to go so fast and then that was the end. At the beginning, he didn't need so much assistance in terms of mobility. However, as the illness progressed, Howard needed more help maneuvering around. Actually, in September 2014, we took two of our grandchildren to Disney. During the trip, Howard started to have trouble walking and, at one point, he said he couldn't button his shirt, and said, "I must have chemo brain." I just tried to comfort him as much as I could. When we returned home, he had an MRI, which showed that the cancer had spread all over his brain. He died just over five months later. It was tough, but we loved him desperately and we all did what we could do. As painful and difficult as it was, I know Howard was

appreciative that he had a good support system of friends and family, who were there to help us get through it.

10. Howard felt terrible that his being sick meant that I needed to work so much harder to take care of him. I don't think he ever felt sorry for himself, but there was a lot of assistance he needed, which bothered him and made him self-conscious. When he could still get up, I would sit with him in the bathroom when he would have a shower, and I would make sure that he was okay. Of course, this was difficult for him because he was always such an independent person. Knowing that his condition was declining and that his cancer had spread to his brain made it a horrible year for Howard and the whole family. Howard maintained an attitude where he felt he would continue to fight as hard as he could but never wanted to become a burden.

11. My husband, once active and full of life, began to just fade away. We would see him in bed, and he just ended up sleeping a lot. Rather than reveal all of his pain, mostly Howard would show his gratitude for the fact that his children and I would always sit with him and keep him company. One time, my youngest daughter, Amanda, actually came into the bedroom and told us to leave so that she could tell her father her secrets. She later told me that after she spoke to him and shared her secrets, with his eyes closed, he opened his eyes as if to tell her that he could hear her. Each daughter had their own kind of relationship with Howard.

12. Howard was an avid reader. One of the most difficult things for my husband was how his condition made it virtually impossible for him to read anymore. He just stopped reading, and there wasn't much anyone could do. Once the cancer spread to his brain, reading became too difficult. I recall clearly how one time at Sloan Kettering, while Howard was undergoing radiation, I was waiting for him outside the treatment room, and I could hear him screaming, "I'm dying, I'm dying, I'm dying." When I went inside, I could see Howard was having what seemed like a horrible panic attack. They admitted him at that point, but there was nothing they could do for him. He was strong, and he fought it with every ounce of strength he had.

13. I would like to note that, as an attorney, Howard did pro-bono work on behalf of 9/11 victims, not realizing at the time that he was to become part of that group himself. It's impossible to ever fully recover from this loss; however, seeking justice on behalf of Howard, and other victims, is a helpful step in the healing process, as it compels us to talk about what

happened and create a record not just about the tragedy but our grief as well.

Karen Sherman
KAREN SHERMAN

Sworn to before me this
29 day of July, 2022

Notary Public

JOSEPH ARCHINA
Notary Public, State of New York
No. 01AR6034577
Qualified in Westchester County
Exp. Date: 12/12/17